

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re:	:	Chapter 11
	:	
LEAHY TRANSPORTATION, INC.	:	Case No. 15-18041 (AMC)
	:	
Debtor	:	
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	:	
In re:	:	Chapter 11
	:	
TLC SCHOOL BUS COMPANY, LLC.	:	Case No. 15-18042 (AMC)
	:	
Debtor	:	
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**ACTING UNITED STATES TRUSTEE'S MOTION TO DISMISS CASE PURSUANT TO  
11 U.S.C. § 1112 (b) AND FOR EXPEDITED HEARING**

The Acting United States Trustee for Region Three, by and through his undersigned counsel, pursuant to 11 U.S.C. Section 1112(b), requests the Court to enter an Order dismissing these cases and seeking expedited consideration and in support thereof states as follows:

1. Andrew R. Vara is the Acting United States Trustee for this jurisdiction.
2. Pursuant to 28 U.S.C. Section 586, the United States Trustee is responsible for the supervision and administration of all cases filed under Chapter 11 of the Bankruptcy Code. The United States Trustee has standing to request conversion or dismissal of this case. 11 U.S.C. §§ 307, 1112(b).
3. Each of the debtors filed petitions for relief under Chapter 11 of the Bankruptcy Code on or about November 9, 2015. Since that date, the Debtors have remained in possession of their assets and have operated as debtors-in-possession. 11 U.S.C. §§ 1107, 1108.

4. Bankruptcy Code Section 1112 provides for the conversion or dismissal of Chapter 11 cases. Under that section, after notice and hearing, for cause shown, the Court may convert or dismiss a case, whichever is in the best interest of creditors and estate. 11 U.S.C. § 1112(b).

5. The debtors do not have adequate insurance coverage on all of the assets of the estate.

6. The failure to maintain adequate insurance coverage causes a diminution of the value of the assets and may cause immediate harm to the estate.

7. The debtor is not operating and cannot generate sufficient income to pay its expenses, including insurance.

8. The debtors are unable to effectuate a plan of reorganization.

9. The United States Trustee requests expedited consideration given the danger of harm to the estate, and requests that a hearing be held on Monday, November 23, 2015 at 11:30 a.m.

**WHEREFORE**, based on the foregoing, the Acting United States Trustee requests that his Motion be granted and that these cases be dismissed.

Respectfully submitted,

ANDREW R. VARA  
Acting United States Trustee, Region 3

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Dated: November 19, 2015